



# United States Department of the Interior

## MINERALS MANAGEMENT SERVICE

Gulf of Mexico OCS Region  
1201 Elmwood Park Boulevard  
New Orleans, Louisiana 70123-2394

In Reply Refer To: MS 5232

Dockets Facility  
U.S. Department of Transportation  
Room PL-401  
400 Seventh Street, SW.  
Washington, DC 20590-001

RSPA-04-17375-3

Re: Docket No. RSPA-04-17375; Notice 1  
Pipeline Safety: Request for Waiver; GulfTerra Field Services LLC

Dear Sir:

The following are the comments from the Minerals Management Service, Gulf of Mexico Region, submitted in triplicate (one original and two copies) on Docket Number RSPA-04-17375, Notice 1.

The 8 hour hydrostatic pressure test is one of the four main criteria used by industry to establish the MAOP for a pipeline. The hydrostatic pressure test is a final check of the quality steps that lead up to the finished pipeline, including but not limited to the steps in manufacturing, transportation, coating, and installation of a pipeline. Humans do make mistakes and the hydrostatic pressure test serves as a quality check. Another purpose for the hydrostatic pressure test is to discover small pipeline defects and leaks, not pipeline burst or collapse failures. Pipelines have been installed in deeper water depths than the Phoenix pipeline and have complied with the 8 hour hydrostatic pressure test requirement. Therefore, before a waiver is granted, research from industry experts should be performed to determine a list of alternatives to the hydrostatic pressure test along with agreed upon steps for using such alternatives.

Should you have any questions on the above information, please contact me at 504-736-2547.

Sincerely,

Alex Alvarado  
Chief, Pipeline Section  
Field Operations